

## Ex. 5 Deliberative Process (DP)

### A. EPA/PADEP Technical Questions/Issues from August 21, 2020 Letter – CRW

1. EPA and PADEP request that CRW provide an updated Hydraulic & Hydrology Model (H&H Model) Report. This Report should include a listing of the collection system components modeled including sewers, pump stations, force mains, control structures, diversion structures and other key collection system appurtenances. The Report should include an assessment of model input data quality as compared to the Level A through Level D criteria presented in Table 5.1 of the Water Environment Federation (WEF) Manual of Practice (MOP) FD-17 - Third Edition (2011). The H&H Model Report should also address: changes to the typical year rainfall (if any); the calibration/validation process employed for the current version of the H&H model; the calibration rainfall/flow data collection effort; and, the calibration/ validation results as compared to Table 5.2 of WEF MOP FD-17 – Third Edition (2011).

The H&H Model Report should present the annual CSO volume and number of CSO occurrences for each permitted CSO structure that would currently occur during the typical year. The H&H Model Report should also provide the current CSO volume at each permitted CSO structure for each of the 15 largest rainfalls in the typical year. Finally, the H&H Model Report should explain the process through which the model will be employed to evaluate CSO abatement alternatives and ultimately to demonstrate compliance with the CSO abatement requirements presented in 1994 CSO Policy Sections II.C.4.a. or II.C.4.b.

2. Approximately two years ago, CRW began discussing the rehabilitation the Front Street Interceptor Sewer utilizing either a Cured-in-Place Pipe (CIPP) lining or a segmented non-circular slip-lining material. EPA has the following questions:
  - a. When will CRW make its decision regarding the rehabilitation approach it will take; or, if CRW has already made that decision, why was this approach selected?
  - b. If CRW has elected to install slip-lining, what is the associated peak capacity loss in the Interceptor and how will that loss affect CSO volumes and frequencies?
  - c. When does CRW expect to complete this project?
3. EPA and PADEP request that CRW provide an overview of the improvements that CRW ultimately envisions that it will construct under its proposed GI/Decentralized Gray approach, including the process that CRW will likely employ to demonstrate that these improvements are the most cost-effective measures for resolving CSOs. CRW should also examine alternate approaches in the same general cost ranges as those approaches proposed, but that can be completed in shorter timeframes. In addition, the Agencies

request that CRW provide an initial long-term schedule for completing the improvements it currently envisions under its proposed GI/Decentralized Gray approach.

4. EPA and PADEP request that CRW provide descriptions and implementation schedules for the GI and Decentralized Gray infrastructure projects that CRW envisions it will complete over the next 10 years under its work categories: Sewer System Renewal, Short-Term Implementation, and Sewer Separation of Small High Frequency Catchments.

Additional short term project not addressed in August 2020 Letter: NMC compliance – EPA and PADEP request that CRW provide more information about current best management practices (BMPs) and NMC practices employed by CRW and other Harrisburg-area agencies that reduce solids/floatables discharges, particularly the street-sweeping, catch-basin/inlet renovation, catch-basin/inlet cleaning, and refuse collection programs. Please provide photos of BMPs and NMC practices currently being performed as available.

CRW has stated that it wishes to address NMC requirements as part of its LTCP improvements. However, the EPA NMC Policy envisions more immediate implementation of interim solutions that will reduce solids/floatables discharges in CSOs.

The implementation schedules should present the key timeline milestones for each project, including the anticipated month and year for: the start of final design; the start of construction; the completion of construction; and, the submittal of post-construction monitoring results.

EPA and PADEP will be requesting that CRW consider providing a tabular listing of projects. This listing should include: a general description of each project scope, major components, projected costs and the potential timeline for the major milestones of that project, such as: start of final design, start of construction, completion of construction, submittal of post-construction monitoring results and actual costs incurred for that particular project. What are the drivers that are dictating CRW's current infrastructure renovation approach? The following table format is suggested:

Project Title/Scope (note whether GI or Decentralized Gray)	Project Key Components	Final Design Start (yr)	Construction Start (Yr)	Construction Complete (Yr)	Post Construction Monitoring complete (Yr)	Project Status

- B. Next Steps – Scheduling the Next Meeting to discuss the memorialization of the projects subject to the interim agreement as well as the overall Enforcement Strategy (with Legal and Technical)